

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

JASON STEUART HIHN

Defendant.

Case No. 1:21-mj-222

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Danielle K. Schnur, being duly sworn, depose and state as follows:

BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been in this position since June 2015. I currently am assigned to the FBI Washington Field Office (WFO) Child Exploitation and Human Trafficking Task Force (CEHTTF), where I investigate crimes involving the sexual exploitation of children, including but not limited to the production, distribution, and receipt of child pornography. As a Special Agent with the FBI, I received training on investigative techniques related to crimes involving the sexual exploitation of children, including surveillance techniques, undercover activities, obtaining and analyzing digital records, analyzing stored digital media, and the application for and execution of search and arrest warrants. I have conducted and assisted in federal child exploitation investigations and have participated in the execution of numerous search warrants in support of child exploitation investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer I am authorized to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of a criminal complaint charging JASON STEUART HIHN with attempted enticement of a minor to engage in criminal sexual activity, in violation of 18 U.S.C. § 2422(b).

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, witnesses, and/or agencies. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to law enforcement concerning this investigation. Rather, I have set forth only the facts necessary to establish probable cause for the requested complaint.

SUMMARY OF PROBABLE CAUSE

5. On or about March 23, 2021, a Special Agent with the FBI, acting in an undercover capacity (the “UC”) from the Eastern District of Virginia, posted on a publicly viewable web forum known to the UC as an online location often frequented by individuals interested in the sexual exploitation of children.¹ The UC posted a message indicating that the UC was interested in “taboo, young, incest,” and provided the UC’s moniker on a mobile messaging application.² Based on the UC’s training and experience, this language is often used and understood by persons with a sexual interest in children.

6. On or about April 21, 2021, the UC received a message on the mobile messaging application from USERNAME 1.³ USERNAME 1 (later identified as HIHN, as described below)

¹ The name of the web forum is known to law enforcement but intentionally omitted to protect the integrity of ongoing law enforcement investigations. The web forum is also used for legitimate, legal purposes.

² The name of the mobile messaging application is known to law enforcement but intentionally omitted to protect the integrity of ongoing law enforcement investigations.

³ The username is known to law enforcement but intentionally omitted to protect the integrity of ongoing law enforcement investigations.

stated he was a 40-year-old male in Baltimore, Maryland named Jason. USERNAME 1 told the UC he was interested in “the very young,” specifically children who are zero to eight years old, but “open to any.”⁴ The UC told USERNAME 1 that the UC was sexually active with the UC’s purported nine-year-old niece and a purported female infant less than one year old.⁵ Regarding his prior experience sexually molesting children, USERNAME 1 told the UC that approximately 10 years ago, he “met a really bad mom” who had a two-year-old son. USERNAME 1 admitted he performed oral sex on the toddler. USERNAME 1 stated the mother “fingered his [the toddler’s] ass and that made him hard for us. It was a nice trick...Eventually she let me oil him up and run my cock between his cheeks. But then she moved away. I never got to enter him like we planned.”

7. USERNAME 1 told the UC he had not been sexually active with any other children in the past 10 years, but he was “always recruiting mom’s or moms-to-be.” The UC asked if this was why USERNAME 1 reached out to the UC, and USERNAME 1 responded “Mmhmm. Is there anyway we can do?” The UC asked what USERNAME 1 would want to do, to which USERNAME 1 responded: “Haha, everything.” USERNAME 1 went on to state he would “love to redo what I did all those years ago with a girl.” USERNAME 1 told the UC he was interested in both the UC’s purported nine-year-old niece and infant, but “mainly the younger one.”

8. USERNAME 1 asked the UC if the UC had photos of the children, asking for “whatever you want to send” and telling the UC “sometimes less is more.” The UC told USERNAME 1 the UC was nervous sending pictures because of a previous bad experience with a different individual. The UC explained: “Yeah he kinda freaked when he found out I was talking

⁴ Quotations from the communications between the UC and USERNAME 1 are included verbatim without corrections for grammar or spelling.

⁵ The children to which the UC referred in conversations with USERNAME 1 are fictitious.

about a real kid....” to which USERNAME 1 responded: “That’s the best part. I’m trying to get this one.”

9. In the course of conversations with the UC, USERNAME 1 sent the UC an image appearing to depict an adult male performing oral sex on the bare vagina of a prepubescent female. USERNAME 1 also sent the UC what appeared to be a computer-generated-image (CGI) consistent with the depiction of child pornography (i.e., an image that would likely qualify as a “visual depiction of a minor engaged in sexually explicit conduct” had the depiction been of an actual person), and several non-sexually explicit images of infants.

10. The UC asked USERNAME 1 what he wanted to do with the UC’s purported nine-year-old niece and infant. USERNAME 1 responded: “Lickalottapus. See if I can make them cum. Finger, and rub my cock on them, maybe more.” USERNAME 1 went on to state: “I want to make them cum, and maybe cum myself..But my main focus is them. Let’s put it this way, I’ll want you to invite me back. So I hope it’s a enjoyable time for all.”

11. The UC and USERNAME 1 continued to communicate after April 21, 2021. In later conversations, USERNAME 1 told the UC: “I just want to love your girls.” When asked how he wanted to love them, USERNAME 1 told the UC, “Licking, fingering mostly. I want to tongue fuck their pussies and asses. I want to french kiss them. I want to drag my cock over their bodies. I want to tickle the entrance of the little one with it, and I might enter the older one. If you allow it.” The UC told USERNAME 1 he could not penetrate the infant. USERNAME 1 responded: “I won’t. I want to rub my tip on her and have my pre-cum lube her. While I feel that baby pussy pushing back on me. I promise I won’t hurt her.”

12. USERNAME 1 told the UC he wanted to hear what the UC’s purported nine-year-old niece thought about him engaging in sexual activity with her. USERNAME 1 told the UC:

“Ask her [the purported nine-year-old] about penises and if she wants to play with one. I really like the idea of her exploring it and when she’s ready, taking it.” USERNAME 1 told the UC to ask the purported nine-year-old: “Does she wonder about penises and does she want to touch one?” The UC asked USERNAME 1: “This isn’t just some fantasy BS right? Totally cool if it is but I don’t wanna ask [purported nine-year-old] about it if your not serious ya know?” USERNAME 1 responded: “[100 emoji].”

13. The UC expressed concern about USERNAME 1 possibly transmitting sexually transmitted diseases (STDs) to the children. USERNAME 1 stated: “How about this, how about the first time, I just use mouth and fingers. You can check my equipment and the best time, if it looks the same to you, we can move on to using that. Really, my big thing is eating that baby pussy. And next is [purported nine-year-old’s] pussy.”

14. At USERNAME 1’s request, the UC sent USERNAME 1 an image of the UC’s purported nine-year-old niece and infant.⁶ In exchange, USERNAME 1 sent a photo of himself to the UC. As explained further below, the image sent by USERNAME 1 appears to be a photo of JASON HIHN.

15. The UC told USERNAME 1: “I did what you asked and mentioned you to [purported nine-year-old niece]...” USERNAME 1 responded, “Oh, what did she say? And did you show my pic to her?” The UC told USERNAME 1 the UC’s purported nine-year-old niece had a couple questions, telling USERNAME 1: “Her biggest concern was what if she’s bad at boy sex stuff??” USERNAME 1 responded: “Oh, I would treat her like a princess and train her. She’s not expected to be great from the start...I just hope she enjoys it and asks me back.” USERNAME 1 went on to tell the UC during their communications: “I’ll treat her right in every way,” and “I’m

⁶ The image did not depict real children.

actually quite a sweet, loving, pervert.”

16. USERNAME 1 and the UC engaged in the following conversation:

UC: What do you want me to tell [purported nine-year-old niece] about you and what you wanna do with her???

USERNAME 1: Oh, that’s a good question. Thought about that a lot today. At the end of it all though, I want to do whatever she’s comfortable with. Like, I’d love to eat her out. Anything else is a bonus.

UC: Should I tell her that? [emoji]

USERNAME 1: But omg, so much bonus to be had. Yes. I want to answer all her boy questions. And teach her about boys. What about the baby though?

UC: I’ll tell [purported nine-year-old niece] all that. Your her first guy so she’ll probs have some questions during playtime....

USERNAME 1: I want to teach her how to enslave boys

UC: Enslave them???

USERNAME 1: Through sex. Yes

UC: (She might not know what that means)

USERNAME 1: It’s ok. She’ll learn. Do I get to play with the baby too?

UC: She’ll need a patient teacher.....Do you wanna play with the baby?

USERNAME 1: I’m very patient and look forward to an ongoing relationship with her. And yes, I would like the baby too.

17. The UC asked USERNAME 1 what he was most looking forward to with the girls.

USERNAME 1 responded: “Spreading her wide and making love to her slit with my mouth. And the baby’s too....Aside from that, is love to have them straddle me naked and grind away.” The UC responded: “I don’t think the baby will know to how to grind....Lol.” USERNAME 1 replied, “I’ll help her. I’ll be so gentle. Yet so hard.”

18. USERNAME 1 went on to tell the UC: “Yeah, I’m really hoping it goes well and

you invite me back. It is to take several sessions to train [purported nine-year-old niece]. And I want her to enjoy it to.” The UC asked USERNAME 1: “how’re you gonna train her?” USERNAME 1 responded: “She’s going to feel like a princess...Heh, I don’t know..I’ve never done this before, but I’ll figure it out, I think normal progressing around the bases... Look at it, touch it, play with it, kiss it..” Communication between the UC and USERNAME 1 continued:

USERNAME 1: Do you ever lick her ass?

UC: Nah I’m more into pussy than ass
That something you wanna do?

USERNAME 1: I’d try it.
But mainly about the pussy
She might like it, might not. Next know until we try

UC: Yeah up to her

USERNAME 1: I’ll start gently, just a lick, “was that a mistake” then do it again...
And again and see what she says

19. USERNAME 1 and the UC discussed their mutual sexual interest in the UC’s purported infant. USERNAME 1 stated: “If I can be honest, sometimes I worry what it’ll do to me.” USERNAME 1 continued: “Like what if it’s as good as everyone says, and I need it.” The UC told USERNAME 1: “And who knows you might not even like it.....,” to which USERNAME 1 responded, “I’m 99% sure I will. The 1% is if I end up thinking she’s too young for more, and I want to do more. I could see myself being addicted. And wanting it as much as you do...Maybe more.” The conversation continued:

UC: Hard limit for me is popping the baby....if you think you won’t be able to stop with her you shouldn’t start....

USERNAME 1: At that age, I don’t think that I’d be into that.

UC: Just making sure....nothing that leaves marks remember??

USERNAME 1: Absolutely

I'll be super gentle with them both

20. USERNAME 1 told the UC he had previously viewed child pornography, stating “I’ve seen pics/vids of little ones covered in dog cum, sucking dog cock, etc” and a video of a two-year-old “getting it in the butt...The kid wasn’t even crying, well until the end when he took some hard thrusts as the man came in him.” USERNAME 1 stated he deletes videos like that right away, and that he does not go looking for them, but “sometimes they get found.” During their communications, USERNAME 1 sent the UC two additional images, each depicting a prepubescent female bent over, exposing her naked anus and vagina to the camera. On one occasion, USERNAME 1 told the UC he wanted to see a picture of the purported nine-year-old girl’s “little slit,” meaning her vagina.

21. On or about June 6, 2021, USERNAME 1 again confirmed with the UC that “coming to have naughty playtime with the girls” was not a fantasy, stating, “Oh I want that for real. Don’t you? [devil emoji]” The UC responded: “I do [heart eyes emoji]...you convinced me lol.” USERNAME 1 asked the UC what he convinced the UC of, and the UC replied, “That it’ll be hot to watch you play with them.” While discussing sexual acts USERNAME 1 intended to perform on the purported infant, the following conversation occurred:

USERNAME 1: I want you to hold her legs for me so I can kiss her sweet spot
Spread her for me
Show me that baby cunt

UC: I think I’m good with that [smiling emoji]

USERNAME 1: It’s so sexy to have a woman present a little one for my enjoyment

UC: I know I said this before but seriously no actual fucking the baby

USERNAME 1: Rubbing my cock only. No insert

UC: [Thumbs up emoji]

USERNAME 1: The most I want to do is have her straddle me, with my cock on my stomach and her on top cowgirl
That's the closest to fucking I'll get with her
Now [purported nine-year-old niece]... She's different [devil emoji]

UC: Ok I'm good with that

USERNAME 1: You'll be there, you can see limits, but I think we have an understanding
*Set

UC: Yes exactly

USERNAME 1: Remember, I want them to enjoy it and ask for more. So in a way, they set the limits.

UC: And what about [purported nine-year-old niece]??

USERNAME 1: I do want to see if I'll fit in her
I'm pretty think
Thick*

UC: I'd want you to bring condoms for that....

USERNAME 1: That's fine
That's not a first time thing though

22. USERNAME 1 continued describing what he intended to do with the purported nine-year-old, stating: "Oh, I think I'm be playful and kiss her all over before moving into special spots. What does she like?" He continued: "I'll do anything she wants... And I'll accommodate any requests of yours...Well if love to see, for science, how much works on her like what works on an adult woman." The UC responded: "Anything she wants...want me to tell her that??" USERNAME 1 replied: "Yes. I'd love to know what she wants." USERNAME 1 told the UC: "I just hope she likes me. Is she ok with this?" The UC responded: "When I asked her before for you she seemed ok with it. since you said she'd be a princess [princess emoji] and you'd teach her how to be good at boys." USERNAME 1 sent the UC three sexually explicit cartoon images of a female

wearing a crown performing oral sex on a penis and straddling a naked male while holding his penis in her hand. Immediately after sending those cartoons, the following communications occurred:

USERNAME 1: How I hope things will go...
See it's what princesses do...[smiling emoji]

UC: Lol [princess emoji] you want me to show her those??

USERNAME 1: Yes
Tell me what she says
Maybe take some pics for me?

UC: You know her boobs aren't that big right?? Lol She's only 9 she's just budding

USERNAME 1: That's fine by me. I like all sizes.

UC: What kinda pics??

USERNAME 1: Whatever you both are comfortable with
[A GIF⁷ of a naked female straddling a male and inserting his penis into her vagina.]
Maybe one day soon this could be us

UC: You and [purported nine-year-old niece?] Maybe.....

USERNAME 1: Yeah

UC: You want me to show her that too?

USERNAME 1: Sure.

23. USERNAME 1 told the UC that the UC's purported nine-year-old niece should call him "her prince" or Kristoff.⁸

24. Throughout their communications, the UC confirmed with USERNAME 1 on more

⁷ A "graphics interchange format," aka GIF, is a digital file often containing a short animation on constant replay.

⁸ Kristoff is the name of a male character in the film *Frozen*, which the UC told USERNAME 1 was the UC's purported nine-year-old niece's favorite film.

than one occasion that the UC was not going to engage in sexual activity with USERNAME 1, to which he responded: “No worries” and “Yes you said that. I’m fine with that.”

25. On or about June 19, 2021, USERNAME 1 sent the UC a close-up picture of a naked prepubescent female’s pubic area and told the UC, “Really enjoying this pic.” USERNAME 1 went on to ask the UC: “Would you mind sending images like that of the girls?” The UC responded: “I don’t have any pics THAT naughty on my phone [winking emoji] lol.” USERNAME 1 responded: “Well you could always take some the next time.”

26. On or about June 20, 2021, the UC and USERNAME 1 arranged to meet each other on the evening of June 24, 2021 in the Eastern District of Virginia, at which meeting USERNAME 1 would engage in illicit sexual conduct with the UC’s purported nine-year-old niece and infant. The following communication occurred between USERNAME 1 and the UC:

USERNAME 1:	...I hope [purported nine-year-old niece] enjoys everything. Baby too
UC:	Yeah them enjoying it is key
USERNAME 1:	I don’t think the baby will care. But You and [purported nine-year-old niece] will be the focus. Have you thought about how it will go?
UC:	Lol good point. But remember the rules no marks no actual sex with the baby
USERNAME 1:	I’m not having sex with anyone right away And no marks either Honestly, I just want to hang out and see where it goes. I’m open to something between nothing and anything
UC:	Yeah just starting with oral
USERNAME 1:	I wish I could watch you with them first
UC:	Which do you wanna start with? Baby or [purported nine- year-old niece]?

USERNAME 1: I think [purported nine-year-old niece] will take they most the, so I'll start with the baby

27. On or about June 21, 2021, the UC and USERNAME 1 communicated via a voice call on the aforementioned mobile messaging application. The UC told USERNAME 1 the UC's biggest fear was not wanting the girls to get hurt and for this first meeting the UC was comfortable with oral sex but not penetration involving the purported children. USERNAME 1 agreed with these restrictions and told the UC: "The big, the big highlight for me is just all of the oral stuff." The UC responded: "Yeah, oh my God, isn't it the best?" to which USERNAME 1 replied, "I mean, I'm gonna find out..."

28. USERNAME 1 told the UC he watched videos consistent with child pornography. For example, USERNAME 1 told the UC he watched a video of a five-year-old boy covered in oil "fucking himself with his hands" and that "it was pretty amazing to watch."

29. USERNAME 1 told the UC: "I think it would be hot for both of us to, uh, participate with [purported nine-year-old niece]." The UC asked what USERNAME 1 had in mind, to which USERNAME 1 responded: "Well someone kissing upper lips someone kissing bottom lips." Based on the UC's training and experience, and the context of the conversation, the UC understood "bottom lips" to be a reference to female genitalia. The UC asked USERNAME 1 if he had a preference, to which he replied: "Oh I hope we would switch." The UC confirmed with USERNAME 1 the UC and USERNAME 1 were not engaging in sexual activity with each other, and that the sexual activity would be focused on the purported nine-year-old. USERNAME 1 confirmed: "Yeah it's all about her. It's all about the princess."

30. The UC asked USERNAME 1 what he actually thought he wanted to do with the baby, and USERNAME 1 responded, "Oh I wanna go down on her." Based on the UC's training

and experience, this phrase means USERNAME 1 wanted to perform oral sex on the purported infant. USERNAME 1 continued, “So the, the most I would ever wanna do with the baby would be to like get under her and straddle me while hold her, her arms up...you said she can hold her head up, so like, it would be like, I’m the horsey, you know what I mean?” He continued, “Except she’s like resting on me, if you know what I mean?” The UC responded, “I assume you mean on your dick?” and USERNAME 1 replied, “Yeah.” The UC clarified: “On, not in.” USERNAME 1 confirmed he only meant on, stating, “There’s no way I’m fitting in that...” and that he did not want to because he was pretty sure the baby would immediately cry and that would kill the mood. USERNAME 1 continued: “For, you know, the first time I think, just, you know some kisses and licks would be, you know, all I would wanna get outta that.”

31. The UC asked USERNAME 1 if he wanted to do the same thing with the purported nine-year-old as with the infant and he responded, “Same thing.” He continued: “I really want her to be, like, participat—participating, and I, you know, I’m willing to apply a little bit of pressure to help guide her, but I don’t want to force her in any way. Um I want her to be happy and enjoy it and um, just be, you know, naturally curious, you know?”

32. USERNAME 1 reiterated to the UC: “I promise you, I will not be disrespectful to either of the girls in either way. And you’re, you’re gonna be there and like, yeah. It, it’s gonna be fine. I’m really not a violent person...” USERNAME 1 told the UC he purchased a costume dress, *Cinderella* tiara, and *Frozen* coloring book as gifts for the UC’s purported nine-year-old niece, to be given to the purported minor upon their meeting.

IDENTIFICATION OF HIHN AND MEETING

33. As mentioned above, USERNAME 1 sent the UC a photo of himself to the UC. A comparison of the photo USERNAME 1 sent of himself to the photo of HIHN maintained by the

Maryland Department of Motor Vehicles (DMV) reveals that both appear to depict the same person. Moreover, additional details provided to the UC by USERNAME 1, such as that his first name is “Jason,” that he lived in the Baltimore area, that he was in his forties, and that he owned a pit bull, are consistent with information obtained from law enforcement databases, commercial databases, and publicly-available sources regarding HIHN.

34. On June 24, 2021, USERNAME 1 confirmed with the UC that he was traveling to the meeting location within the Eastern District of Virginia that had previously been arranged. USERNAME 1 requested another picture of the aforementioned children while traveling to the meeting location. The UC sent USERNAME 1 the requested image.⁹ USERNAME 1 told the UC that he was “really nervous” and agreed to meet the UC in front of the meeting location. Law enforcement officers at the meeting location then observed HIHN exit a blue Audi vehicle with Maryland license plate CARDIS. According to records maintained by the Maryland DMV, this vehicle is registered to HIHN. HIHN was taken into custody by law enforcement officers at the meeting location.

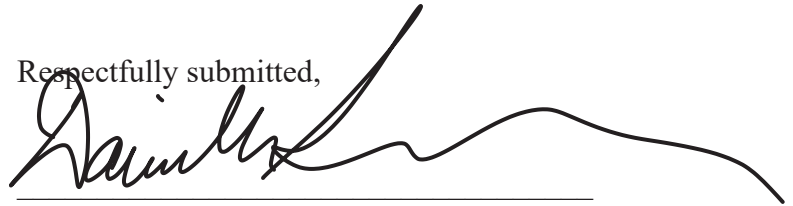
35. Many of the acts that HIHN sought to commit with the UC’s purported nine-year-old niece and infant are acts for which HIHN can be charged with a criminal offense under the laws of the Commonwealth of Virginia, specifically Va. Stat. Ann. §§ 18.2-67.3 (defining aggravated sexual battery as sexual abuse of a person less than 13 years of age); 18.2-67.10 (defining sexual abuse to include intentionally touching a complaining witness’s intimate parts or material directly covering such parts, and further to include causing a complaining witness under the age of 13 to touch the intimate parts of the accused).

⁹ The image did not depict actual children.

CONCLUSION

36. Based upon the above information, I respectfully submit there is probable cause to believe that HIHN attempted to entice a minor to engage in criminal sexual activity, in violation of 18 U.S.C. § 2422(b). I therefore respectfully request that the Court issue the attached complaint charging HIHN with that offense.

Respectfully submitted,



Danielle K. Schnur
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me by reliable telephonic means pursuant to Fed. R. Crim. P. 4.1 this 25th day of June, 2021.

Theresa C.
Buchanan

Digitally signed by Theresa C.
Buchanan
Date: 2021.06.25 11:42:56
-04'00'

HON. THERESA CARROLL BUCHANAN
UNITED STATES MAGISTRATE JUDGE